

FILED

OCT 07 2021

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_  
DEPUTY CLERK

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Attorneys for Plaintiff  
United States of America

SEALED

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH GOULD,

Defendant.

CASE NO. 1:21 CR · 00243-SKO  
MOTION AND PROPOSED ORDER TO  
SEAL INDICTMENT

The government moves the Court, pursuant to Rule 6(e) of the Federal Rules of Criminal Procedure, to order and direct that the Indictment returned by the Grand Jury on October 7, 2021, charging the above defendant with a violation 18 U.S.C. § 2113(b) – Bank Larceny; 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(C) – Criminal Forfeiture, be kept secret until the defendant named in this Indictment is either in custody or has been given bail on these offenses; and further order that until such time as the defendant is in custody or has been given bail, that no person shall disclose the finding of the Indictment

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1 or any warrant issued pursuant thereto, except when necessary for the issuance and  
2 execution of the warrant.

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4 DATED: October 7, 2021

Respectfully submitted,

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6 PHILLIP A. TALBERT  
Acting United States Attorney

7  
8 By /s/ Joseph D. Barton  
JOSEPH D. BARTON  
9 Assistant U.S. Attorney

10  
11 IT IS SO ORDERED.

12 Dated: October 7, 2021

13   
14 STANLEY A. BOONE  
U.S. Magistrate Judge